

BROMBERG LAW LLC

Yael Bromberg, Esq., Principal*
Brett M. Pugach, Esq., of Counsel**

43 West 43rd Street, Suite 32
New York, NY 10036-7424

T: (212) 859-5083 | F: (201) 586-0427

P.O. Box 1131
Glen Rock, NJ 07452-1131

January 4, 2021

VIA ELECTRONIC FILING

Hon. Freda L. Wolfson, C.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

**RE: Conforti v. Hanlon, Case 3:20-cv-08267-FLW-TJB
Request for Leave to File Amended Complaint and to Enter Proposed
Scheduling Order with Consent of Parties**

Dear Honorable Chief Judge Wolfson,

This firm represents the plaintiff, Christine Conforti (“Plaintiff”) in the above-captioned matter. At this time, each of the three county defendants has filed a motion to dismiss which is currently pending before the Court, returnable January 19, 2021. Plaintiff’s time to file an amended complaint by right has passed, and the deadline for opposition briefs to Defendants’ respective motions to dismiss is tomorrow. We were not able to file our amended complaint by right in light of scheduling and availability issues of various individuals surrounding the holidays. Therefore, having graciously obtained the consent of counsel of all Defendants, Plaintiff is respectfully requesting that the Court grant us leave to file an amended complaint, withdraw Defendants’ pending motions to dismiss, and set the parties’ proposed schedule for the filing of an amended complaint and corresponding motions to dismiss. We have attached a proposed consent order reflecting the proposed schedule. We believe that the proposed scheduling of the filing of an amended complaint and of subsequent motions to dismiss by Defendants will streamline the process.

Thank you for the Court’s consideration of this matter.

Respectfully submitted,

/s/ Brett M. Pugach
Brett M. Pugach, Esq.
BROMBERG LAW LLC

*Counsel for Plaintiff,
Christine Conforti*

CC. All Counsel of Record (via electronic filing)

* Licensed to practice in New Jersey, New York, and the District of Columbia

** Licensed to practice in New Jersey and New York